

# EXHIBIT A



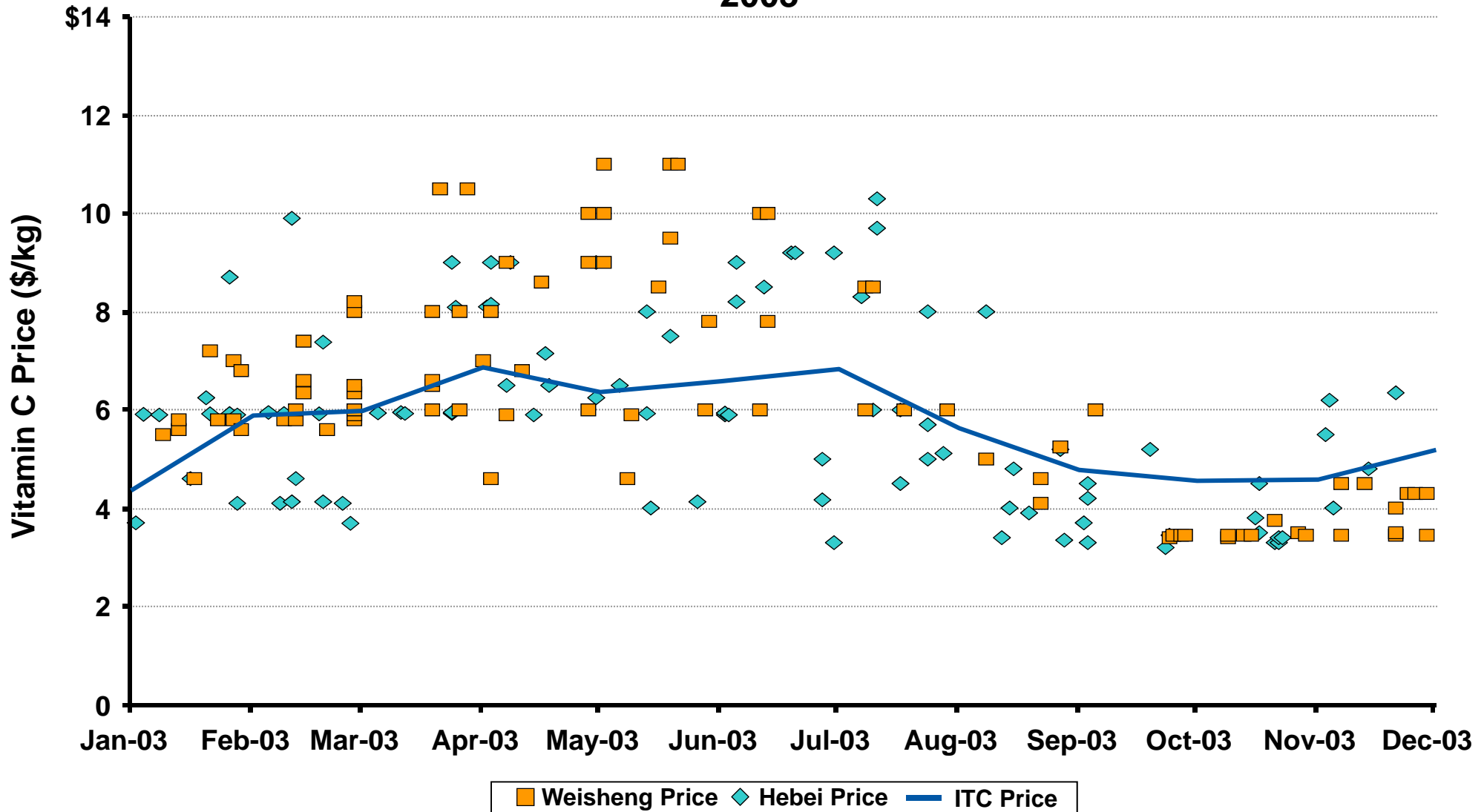
## Testimony of Dr. Lawrence Wu

# Economic Framework for Modeling Damages

- Calculate prices actually paid by customers
- Use an economic model to estimate the price customers would have paid if there had been no agreements
  - Apply regression analysis using a benchmark period to “forecast” prices during the period of alleged unlawful agreements
- Calculate the overcharge in prices
- Calculate damages
  - Amount of overcharge (estimated by month) times amount of relevant purchases

# The Average ITC Price Does Not Capture the Actual Prices Paid by Customers

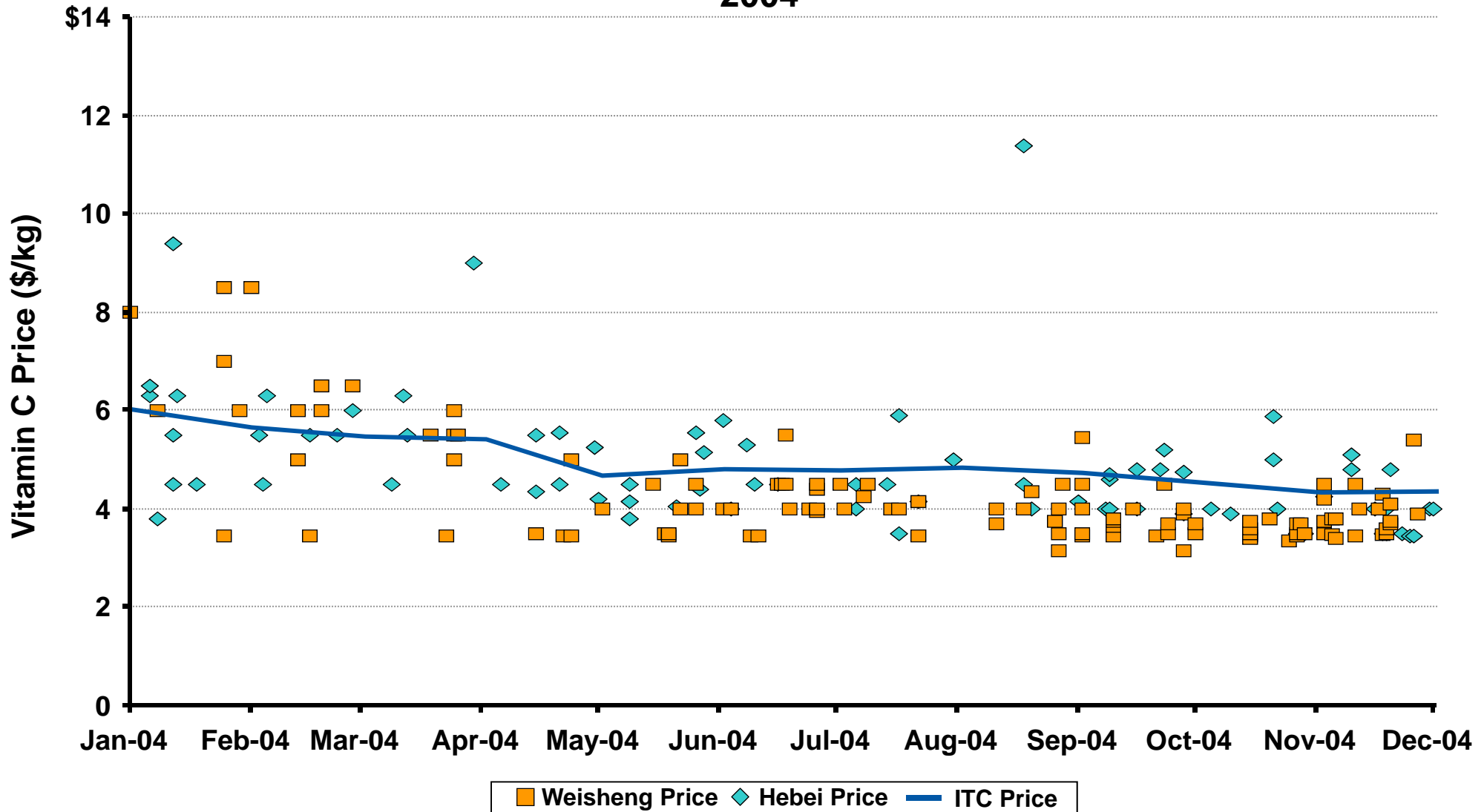
**Actual Vitamin C Prices Paid by U.S.  
Customers of Hebei and Weisheng  
2003**



Source: Hebei sales data, Weisheng sales data, and ITC.

# The Average ITC Price Does Not Capture the Actual Prices Paid by Customers

## Actual Vitamin C Prices Paid by U.S. Customers of Hebei and Weisheng 2004



Source: Hebei sales data, Weisheng sales data, and ITC.

# Actual Prices Paid by Customers

## Actual Vitamin C Prices Paid by U.S. Customers of Hebei and Weisheng 2003

